

Clinton Brown, *Self-Represented*  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,

Plaintiff,

v.

CLARK R. TAYLOR, AICP, THE LOS  
ANGELES COUNTY DEPARTMENT  
OF REGIONAL PLANNING,

Defendant.

**Case No.** 2:22-cv-09203-MEMF-KS

**Declaration of Clinton Brown**

**Judge:** Honorable Maame Ewusi-Mensah  
Frimpong

**Chief Magistrate Judge:** Karen L. Stevenson

**DECLARATION OF CLINTON BROWN IN SUPPORT OF TRO**

I, Clinton Brown, pursuant to 28 U.S.C. § 1746, declare as follows:

**Background**

1. I am the Plaintiff in the above-captioned matter. I submit this declaration to provide factual information in support of my Motion for a Temporary Restraining Order (“TRO”) related to the Government’s refusal to issue permits for my proposed 200-house subdivision project.

**Communications with the Subdivisions Section Head**

2. In or around March 2021, I had phone and email conversations with Josh Huntington, AICP, Section Head of Los Angeles County Planning for Subdivisions, regarding my proposed 200-house subdivision project. During these communications, Mr. Huntington unequivocally stated that even if subordinate staff approved the project, his office would recommend against approval at the Board of Supervisors level.

3. Mr. Huntington further explained that, while the project was otherwise well-conceived and beneficial, the property itself was not considered suitable for such development. However, no substantive or legal justification was provided for this conclusion.

#### **Urgency of the Current Situation**

4. Recent wildfires have significantly exacerbated the housing crisis in the area, making this property and its development critical to providing urgently needed housing. My proposed project would directly address the shortage of housing for individuals displaced by these disasters, including 600 people who have signed up for housing on my website.
5. Despite the pressing need for housing, the Government has made it clear through its actions and prior communications that it will not allow any development on this property, regardless of compliance with applicable laws or benefits to the community.

#### **Impact of the Government's Actions**

6. The Government's refusal to issue permits has rendered my property economically idle and unusable, constituting a regulatory Taking of my property without Just Compensation, in violation of the Fifth and Fourteenth Amendments.
7. The ongoing refusal to permit development has caused significant and irreparable harm, not only to me as the property owner but also to the community, which urgently needs the housing this project would provide.

#### **Conclusion**

8. The Government's continued obstruction and refusal to issue permits has left me with no choice but to seek immediate judicial relief. I respectfully request that this Court issue a Temporary Restraining Order requiring the Government to issue the necessary permits for my project without further delay to prevent additional irreparable harm to my property, business and the community.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Dated: January 12, 2025

/s/Clinton Brown